

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|---------------------------|---|-----------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | No. 23 CR 28 |
| |) | |
| vs. |) | |
| |) | Judge Edmond E. Chang |
| |) | |
| JEFF MCGRAW |) | |

JEFF MCGRAW'S MOTION FOR PRE-TRIAL RELEASE

NOW COMES Defendant, JEFF MCGRAW through his counsel, JOSHUA B. ADAMS, pursuant to The Bail Reform Act, §3142, and respectfully requests that this honorable court release him on a reasonable bond pending the resolution of his case. In support of his motion, Mr. McGraw states the following.

On January 18, 2023, a grand jury returned a single count indictment alleging Mr. McGraw possessed a firearm after sustaining a felony conviction, pursuant to 18 U.S.C. §922(g)(1). At the time, Mr. McGraw had been in the custody of the Illinois Department of Corrections for a Supervised Release violation based on the underlying facts of this case.

Mr. McGraw's revocation term is set to expire on May 26, 2023. At that time, he will be transferred to the custody of the United States Marshalls. He now seeks this honorable court to set a bond including conditions of home

incarceration and location monitoring to ensure his attendance at court and to protect the public.

Because Mr. McGraw had been in the custody of IDOC, a Pre-Trial Services report had not been completed. Counsel will contact Pre-Trial Services and coordinate an interview and report if possible, prior to the May 25, 2023, hearing.

Respectfully submitted,

/s/Joshua B. Adams

Joshua B. Adams

Counsel for Jeff McGraw

Joshua B. Adams
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